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 La Quinta Franchising, LLC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT, SAN FRANCISCO

LA QUINTA FRANCHISING, LLC,
 a Nevada limited liability company,

Plaintiff,

vs.

CORDELIA HOTEL VENTURE, INC.,
 a California Corporation and DOLAT
 PATEL, an individual,

Defendants.

Case No. C072556 JL

[Assigned to Magistrate Judge James
 Larsen]

NOTICE OF MOTION AND MOTION
 OF PLAINTIFF LA QUINTA
 FRANCHISING, LLC, FOR DEFAULT
 JUDGMENT AGAINST
 DEFENDANTS CORDELIA HOTEL
 VENTURE, INC. AND DOLAT PATEL

Date: TBD
 Time: TBD
 Dept: TBD

[Filed concurrently with Points and
 Authorities; Declaration of Rajiv
 Trivedi; Declaration of Joel Siegel; and
 [Proposed] Order]

TO DEFENDANTS CORDELIA HOTEL VENTURE, INC. AND DOLAT
 PATEL:

PLEASE TAKE NOTICE that on a date and at a time TBD later, in
 Courtroom F of the above-entitled Court, located at 450 Golden Gate Ave., San
 Francisco, California, Plaintiff La Quinta Franchising, LLC ("Plaintiff") will
 present its Motion for Default Judgment in the amount of **\$129,131.45** ("Motion")

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1 against Defendants Cordelia Hotel Venture, Inc. and Dolat Patel. The Clerk
2 previously has entered defaults against Defendant Cordelia Hotel Venture, Inc. and
3 Dolat Patel on July 10, 2007.

4 This Motion is based upon the Memorandum of Points and Authorities, the
5 Declaration of Rajiv Trivedi, and the Declaration of Joel Siegel, filed and served
6 concurrently herewith, on the following grounds: Plaintiff completed service of the
7 Summons and Complaint on Defendant on May 15, 2007. Defendant did not file a
8 responsive pleading or otherwise defend against Plaintiff's Complaint within the
9 20-day period, which expired on June 4, 2007, or at any time to date since the
10 service was completed. This Court entered default as to Defendants Cordelia Hotel
11 Venture Inc. and Dolat Patel on July 10, 2007.

12
13 Dated: August 20, 2007

BRYAN CAVE LLP
JOEL D. SIEGEL

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15 By: 

16 Joel D. Siegel
17 Attorneys for Plaintiff
18 LA QUINTA FRANCHISING, LLC
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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 120 Broadway, Suite 300, Santa Monica, California 90401-2386.

On August 20, 2007, I served the following documents, described as:

NOTICE OF MOTION AND MOTION OF PLAINTIFF LA QUINTA FRANCHISING, LLC, FOR DEFAULT JUDGMENT AGAINST DEFENDANTS CORDELIA HOTEL VENTURE, INC. AND DOLAT PATEL

MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS CORDELIA HOTEL VENTURE, INC. AND DOLAT PATEL

DECLARATION OF RAJIV TRIVEDI IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT

DECLARATION OF JOEL SIEGEL IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT

[PROPOSED] ORDER FOR DEFAULT JUDGMENT AGAINST DEFENDANTS CORDELIA HOTEL VENTURE, INC. AND DOLAT PATEL

on each interested party in this action, as follows:

Dolat Patel
782 Ignacio Woods Court
Concord, CA 94518

Mohammed Rahseparian,
Agent for Service of Process
Cordelia Hotel Venture, Inc.
5370 Clayton Road
Concord, CA 94520

☒ (BY MAIL) I placed a true copy (or original) of the foregoing document in a sealed envelope addressed to each interested party as set forth above. I placed each such envelope, with postage thereon fully prepaid, for collection and mailing at Bryan Cave LLP, Santa Monica, California. I am readily familiar with Bryan Cave LLP's practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice, the correspondence would be deposited in the United States Postal Service on that same day in the ordinary course of business.

☐ (BY DELIVERY) I caused a true copy of the foregoing document to be served by delivery to the offices of counsel of record for the interested party in this action.

☐ (BY FEDEX) I deposited in a box or other facility maintained by FedEx, an express carrier service, or delivered to a courier or driver authorized by said express carrier service to receive documents, a true copy of the foregoing document, in an envelope designated by said express service carrier, with delivery fees paid or provided for.

Executed on August 20, 2007, at Santa Monica, California.

☒ (FEDERAL ONLY) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America and the state of California that the foregoing is true and correct.


KAMEELAH HAKEEM

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